

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:  ROBERT M. YOUNG, and FRANCES YOUNG, Debtor,  SPECIALIZED LOAN SERVICING, LLC, AS SERVICING AGENT FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY ABS CAPITAL I INC. TRUST 2006-HE4, Movant,  v.  ROBERT M. YOUNG, FRANCES YOUNG., and KENNETH E. WEST, Trustee, Respondents.	Bankruptcy No. 19-14322-pmm  Chapter 13  Related to Doc. No.
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NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Specialized Loan Servicing, LLC, as Servicing Agent for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-HE4 has filed a Motion to Approve a Loan Modification with the Court to lift the automatic stay regarding the property at 1032 Flanders Road, Philadelphia, PA 19151.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **Friday, July 14, 2023**, you, or your attorney must do **all** of the following:

(a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court  
Robert C. Nix Bldg. Suite 201  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Keri P. Ebeck, Esquire  
Bernstein-Burkley, P.C.  
601 Grant Street, 9<sup>th</sup> Floor  
Pittsburgh, PA 15219

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **Wednesday, August 9, 2023 at 1:00 PM** in Courtroom #1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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*Counsel for Specialized Loan Servicing,  
LLC, as Servicing Agent for Deutsche Bank  
National Trust Company, as Trustee for  
Morgan Stanley ABS Capital I Inc. Trust  
2006-HE4*

Dated: June 30, 2023